

Message

From: Daniel Liebowitz [Daniel.Liebowitz@allnex.com]
Sent: 9/16/2020 8:40:48 PM
To: Malagon, Hector [Malagon.Hector@epa.gov]; Colette Moulaert [Colette.Moulaert@allnex.com]; Christopher Aiuto [Christopher.Aiuto@allnex.com]
CC: Master, Barbora [Master.Barbora@epa.gov]; Snyderman, Steven [Snyderman.Steven@epa.gov]; Edelstein, Rebecca [Edelstein.Rebecca@epa.gov]
Subject: RE: Update on P-19-0049

Hello Hector,

The language stated in your email is acceptable. However, the water trigger option is not acceptable to allnex. We will need to conduct the up-front aquatic toxicity testing.

Regards,
Dan

From: Malagon, Hector <Malagon.Hector@epa.gov>
Sent: Wednesday, September 16, 2020 3:31 PM
To: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>; Colette Moulaert <Colette.Moulaert@allnex.com>
Cc: Master, Barbora <Master.Barbora@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: Update on P-19-0049

Hello Daniel

I wonder if you have an answer to this email that I sent you on August 31. Is the submitter Ok with the language?

Thank you

<<< PLEASE DO NOT TRANSMIT ANY INFORMATION >>>
<<< CONSIDERED CBI TO THIS EMAIL ADDRESS >>>

Hector Malagon
Environmental Protection Specialist
U.S. EPA, Office of Pollution Prevention and Toxics
Chemical Control Division
New Chemicals Management Branch,
WJC-East, Room: 4133k, Mail Code: 7405M
Phone: 202-564-0535
Fax: 202-564-9490

From: Malagon, Hector
Sent: Monday, August 31, 2020 12:23 PM
To: 'Daniel Liebowitz' <Daniel.Liebowitz@allnex.com>; Colette Moulaert <Colette.Moulaert@allnex.com>
Cc: Master, Barbora <Master.Barbora@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>
Subject: RE: Update on P-19-0049

Yes. The first restriction apply only to manufacture and processing.

Application of coating will be part of the use sites and it is not included in this restriction because you have inhalation exposure estimated during use. However, that is (in part) the reason why you got the second restriction.

Hector

From: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>

Sent: Monday, August 31, 2020 12:17 PM

To: Malagon, Hector <Malagon.Hector@epa.gov>; Colette Moulaert <Colette.Moulaert@allnex.com>

Cc: Master, Barbora <Master.Barbora@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>

Subject: RE: Update on P-19-0049

Hello Hector,

Please confirm that the first restriction would only be applicable to manufacturing/import and formulation (e.g. processing) and not application of coatings containing the PMN substance. I am still waiting for a response from our Product Line Manager for the PMN substance to confirm the water trigger would be acceptable.

Regards,
Dan

From: Malagon, Hector <Malagon.Hector@epa.gov>

Sent: Monday, August 31, 2020 11:51 AM

To: Daniel Liebowitz <Daniel.Liebowitz@allnex.com>; Colette Moulaert <Colette.Moulaert@allnex.com>

Cc: Master, Barbora <Master.Barbora@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>

Subject: Update on P-19-0049

Importance: High

[EXTERNAL] Email from outside allnex. Be careful with links and attachments.

Hi Daniel

This is an update of the restrictions in the Consent Order for P-19-0049.

Consent Order include the following restrictions:

- 1- "No **manufacture or process** in a method that generate vapor, spray, dust mist or aerosol". (different language for this restriction could say: "**not manufacture or process in a method that generate inhalation exposures to workers**").
- 2- Use as stated in the PMN with maximum concentration of the component in formulation, as stated in the PMN. **(this is the component stated in the health report you received. Call me and I can tell you which one is. I cannot put CBI here)**
- 3- Water trigger for 1 ppb (releases to water as long as the concentration in water of the PMN does not exceed 1 ppb)

Under these conditions, no testing is required at all. I need to know if these conditions are OK for the submitter.

- In bullet 1, I need to know which language is more preferred.
- In bullet 3, I need to know if submitter is OK with the water trigger. **If the submitter is not OK, I will need to change the order to upfront ecotoxicity testing.**

I will give you some similar update for 75 as soon as I receive confirmation from management.

Best regards,

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Hector Malagon
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